

**IN THE UNITED STATES DISTRICT COURT OF
MIDDLE DISTRICT OF ALABAMA**

CHIQUITA McKINNES,

Plaintiff,

v.

JOHNSON & JOHNSON, INC.;
JOHNSON & JOHNSON
PHARMACEUTICAL RESEARCH AND
DEVELOPMENT, LLC; ORTHO-MCNEIL
PHARMACEUTICAL, INC., BRAD
MORROW, Sales Representative, JAMIE
FORBES, Sales Representative, and
FICTITIOUS DEFENDANTS A, B, C, D, E
and F, being those persons, sales representative,
firms or corporations whose fraud, scheme to
defraud, negligence and/or other wrongful
conduct caused or contributed to the Plaintiff's
injuries, and whose true names and identities
are presently unknown to the Plaintiff but will
be substituted by amendment when ascertained,

Defendants.

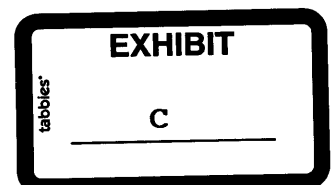
Case No.: _____

DECLARATION OF BRAD MORROW

I declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am a citizen of the State of Alabama. I have personal knowledge of the matters contained in this declaration and could competently testify to these facts if necessary.

2. I am currently employed as a pharmaceutical sales representative for Ortho-McNeil Pharmaceutical, Inc., (hereinafter referred to as "Ortho-McNeil").



3. As an Ortho-McNeil sales representative, my primary job responsibility is to provide information to healthcare providers in my assigned geographic territory.

4. As a sales representative for Ortho-McNeil, I provide information on several products, including Ortho Evra®.

5. At no time did I provide Ortho Evra® or information concerning Ortho Evra® directly to Chiquita McKinnes. Nor do I have any dealings with any patients of any of the physicians upon whom I call.

6. The only information that I provide to healthcare providers regarding the pharmaceutical products, including Ortho Evra®, is limited to promotional and patient education materials provided by Ortho-McNeil which are consistent with the information contained in the FDA-approved product.

7. I had no involvement in the development or preparation of the prescribing information for Ortho Evra®, and did not have any responsibility for the content of other written warnings concerning Ortho Evra®.

8. At no time did I have any involvement with the manufacture, development or testing of Ortho Evra®.

9. At no time did I ever sell, offer to sell or take orders for the sale of Ortho Evra® to patients. Physicians upon whom I would call would write their prescriptions for Ortho Evra® based upon their own independent medical knowledge and judgment and I would not have direct knowledge of any specific prescriptions these physicians may have written to individual patients, including but not limited to Chiquita McKinnes.

10. I am not a physician and accordingly have never prescribed Ortho Evra®. I am not a pharmacist and therefore have never filled an Ortho Evra® prescription as a pharmacist.

11. I have never provided any warranty to any physician with respect to Ortho Evra®.

12. I have never met nor spoken with Chiquita McKinnes.

I am making this declaration under penalty of perjury pursuant to 28 U.S.C. § 1746 in Prattville, Alabama this 16 day of June, 2006.


BRAD MORROW